

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Paisley Park Enterprises, Inc. and)	Civil Action No. 17-cv-1212
Comerica Bank & Trust, N.A., as)	
Personal Representative of the Estate of)	
Prince Rogers Nelson,)	
))	
))	
Plaintiffs,))	
))	
v.))	
))	
George Ian Boxill,))	
))	
Defendant.))	
))	

DEFENDANT'S NOTICE OF REMOVAL

Please take notice that Defendant George Ian Boxill (“Boxill”), by and through its undersigned counsel, pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, removes Case No. 10-CV-17-337 from the District Court of Carver County, Minnesota, to the United States District Court for the District of Minnesota. In support of removal, Boxill submits this notice and states as follows:

1. This action is properly removable to this Court under 28 U.S.C. § 1441. This Court has original subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1332(a).

2. There is complete diversity of parties as required by 28 U.S.C. 1332(a).

Defendant Boxill is a citizen of the state of California. Neither Plaintiff Paisley Park Enterprises, Inc. nor Plaintiff Comerica Bank & Trust, N.A., as Personal Representative of the Estate of Prince Rogers Nelson, is a citizen of California.

3. The amount in controversy exceeds \$75,000 as required by 28 U.S.C. § 1332(a). Plaintiffs' Complaint asserts claims of breach of contract, conversion, replevin, civil liability for

theft, and misappropriation of trade secrets, relating to Boxill's alleged possession and use of sound recordings purportedly owned by artist Prince's Estate. Plaintiffs seek injunctive relief as well as damages, exemplary damages, punitive damages, and attorneys' fees, costs, and expenses.

4. The breadth of injunctive relief and damages sought by Plaintiffs show that the amount in controversy exceeds \$75,000. In addition, the Parties' negotiations with a nonparty further evidence that the amount in controversy exceeds \$75,000. Those negotiations among Plaintiffs, Boxill, and a nonparty resulted in an offer for payment from the nonparty of over \$75,000 for one of the sound recordings at issue in this dispute.

5. This action was originally filed in the District Court of Carver County, Minnesota, on April 14, 2017, along with Plaintiffs' motion for temporary restraining order. Plaintiffs have purported or alleged service of the Complaint on Boxill on April 17, 2017. This Notice of Removal is therefore filed within the 30-day period prescribed by 28 U.S.C. §1446(b).

6. Removal to this District is proper pursuant to 28 U.S.C. §1441(a) because this District embraces the District Court of Carver County, Minnesota, the forum in which the removed action was originally filed.

7. In accordance with 28 U.S.C. § 1446(a), Boxill concurrently files herewith the Complaint and Summons from the removed action Case No. 10-CV-17-337 and includes as Exhibits A-G true and correct copies of all additional pleadings, memorandums, affidavits, and orders served upon it in connection with the removed action, as of the date of this Notice of Removal.

8. As required by 28 U.S.C. § 1446(d), Boxill will promptly file with the District Court of Carver County, Minnesota, and serve upon Plaintiff's counsel, a true and correct copy of this Notice of Removal.

For all of these reasons, Boxill respectfully removes Case No. 10-CV-17-337 from the District Court of Carver County, Minnesota to this Court.

Dated: April 18, 2017

By: s/Anthony R. Zeuli

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CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2017, a true and correct copy of the foregoing was filed electronically and served by e-mail upon any party unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Courts CM/ECF system.

/s/ Anthony R. Zeuli
Anthony R. Zeuli